

THE HONORABLE JAMAL WHITEHEAD

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

SAMUEL FETCHERO et al.,

Plaintiff(s),

vs.

AMICA MUTUAL INSURANCE  
COMPANY,

Defendant(s).

NO. 2:22-cv-00400-JNW

STIPULATED MOTION TO EXTEND  
DISCOVERY DEADLINE FOR EXPERT  
DEPOSITION

NOTING DATE: September 12, 2023

Plaintiffs SAMUEL and ALLISON FETCHERO and Defendant AMICA MUTUAL INSURANCE COMPANY (“Amica”), by and through their undersigned attorneys, respectfully submit this Stipulated Motion to Extend Discovery Cut Off specific to the deposition of expert Mary Owen, which necessitated additional rescheduling after the previously extended August 28, 2023 deadline.

The Court may extend discovery deadlines upon a showing of good cause by the moving party or parties. *See, e.g., Weyerhaeuser Co. v. Accurate Recycling Corp.*, 224 F.R.D. 648, 649 (W.D. Wash. 2007) (extending discovery deadlines for good cause). Good cause exists here.

On July 26, 2028, this Court entered an Order extending the discovery deadline to August 28, 2023 with respect to two depositions that required rescheduling due to unforeseen family emergencies, Plaintiff Samuel Fetchero and Expert Mary Owen. Dkt. No. 47. At that time, the parties were working to reschedule Mary Owen’s deposition

STIPULATED MOTION TO EXTEND DISCOVERY DEADLINE  
FOR EXPERT DEPOSITION - 1

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The parties were ultimately able to reschedule Mary Owen's deposition for August 18, 2023, ahead of the extended deadline. However, Ms. Owen came down with an illness that required rescheduling the deposition again. The parties worked cooperatively to reschedule the deposition for September 15, 2023.

Accordingly, the parties have agreed and hereby stipulate to an extension of the discovery deadline to allow time for this deposition. The parties submit that the above shows good cause to extend the discovery deadline as set forth below. Thus, the parties respectfully request that the Court enter an order in line with the parties' stipulation, extending the discovery cut-off specific to Ms. Owen's deposition to September 15, 2023.

IT IS SO STIPULTED, THROGUH COUNSEL OF RECORD

Dated this 12<sup>th</sup> day of September, 2023

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XÓCHIHUA, PC**

**ELLIS | LI | MCKINSTRY**

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***Counsel for Plaintiffs***

1 PURSUANT TO STIPULATION, IT IS ORDERED that the Motion is GRANTED  
2 *nunc pro tunc*.

3 IT IS FURTHER ORDERED that

4 The discovery deadline shall be extended to September 15, 2023 to allow for the  
5 rescheduled deposition of Mary Owen.

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8 Dated: September 18, 2023.  
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13 Jamal N. Whitehead  
14 United States District Judge  
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